

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>KAMME O,</b>	§	
<i>Plaintiff,</i>	§	
	§	
<b>v.</b>	§	<b>CIVIL ACTION No. 4:17-cv-03877</b>
	§	
<b>TEXAS A&amp;M UNIVERSITY, ET. AL.,</b>	§	
<i>Defendants</i>	§	

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**DEFENDANTS' OBJECTIONS TO PLAINTIFF'S EVIDENCE  
AND MOTION TO STRIKE**

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TO THE HONORABLE MAGISTRATE JUDGE NANCY K. JOHNSON:

Defendants file these objections to Plaintiff's evidence attached as exhibits to Plaintiff's Response to Defendants' Motion to Dismiss and move to strike Plaintiff's Exhibits 1 through 12.

**A. INTRODUCTION**

1. Plaintiff is Kamme O; defendants are Texas A&M University and Texas A&M University System.

2. On May 15, 2018, Plaintiff filed her response to Defendants' Motion to Dismiss and attached 12 exhibits. [DKTs 30 and 31]

**B. OBJECTIONS**

3. Defendants file the following objections to the admissibility and authenticity of the attached exhibits:

- a. Plaintiff's Exhibits 1 through 12 [DKTs 30, 30-1 through 30-6, and 31] should be stricken for the following reasons:

- i.) Exhibits 1-12 are vague, confusing, filled with conclusory statements that are based upon Plaintiff's subjective belief and without evidentiary basis;
- ii.) Exhibits 1-12 are incomplete and thus inadmissible under Federal Rule of Evidence 106 unless the remainder of it is introduced;
- iii.) Exhibits 1-12 are not relevant evidence as defined by Federal Rule of Evidence 401 and thus is inadmissible under Federal Rule of Evidence 402;
- iv.) any probative value in Exhibits 1-12 is substantially outweighed by the danger of unfair prejudice and a confusion of the issues and should be excluded under Federal Rule of Evidence 403;
- v.) because there is not sufficient evidence that the statements contained in Exhibits 1-12 are based on personal knowledge these exhibits should be excluded under Federal Rule of Evidence 602;
- vi.) Exhibits 1-12 contain opinions or inferences that are inadmissible under Federal Rules of Evidence 701 and 702;
- vii.) because any probative value is substantially outweighed by their prejudicial effect and should be excluded under Federal Rule of Evidence 703;
- viii.) Exhibits 1-12 are hearsay as defined by Federal Rule of Evidence 801 and thus are inadmissible under Federal Rule of Evidence 802; and
- ix.) Exhibits 1-12 contain improper summaries and thus are inadmissible under Federal Rule of Evidence 1006.

### C. CONCLUSION

4. For these reasons, Defendants ask the Court to sustain their objections and strike Plaintiff's exhibits and evidence as inadmissible and not proper.

Respectfully submitted,

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*/s/ Yvonne D. Bennett*  
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ATTORNEYS FOR DEFENDANTS  
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TEXAS A&M UNIVERSITY SYSTEM

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this document has been served via PACER  
electronic notification and email on this 17th day of May 2018, on:

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